

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Case No. 21-31686
Park 4 Less, LLC	§	
Debtor	§	Chapter 11

**EMERGENCY MOTION OF REESE BAKER REGARDING IN PERSON
APPEARANCE OF TAMMY CHANDLER**

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THIS MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF, OR IF YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

ADUIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING APPLICATION. TO CONNECT, YOU SHOULD ENTER THE MEETING CODE "JUDGELOPEZ" IN THE GOTOMEETING APP OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE IN THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON

**IN THE UPPER RIGHT HAND CORNER AND ENTER YOUR NAME
UNDER PERSONAL INFORMATION SETTING.**

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Reese Baker dba Baker & Associates (“Baker”) as a party to the order to appear to show cause issues at docket #131 and would show this court as follows:

1. Tammy Chandler is a paralegal that has worked for Baker for many years.
2. Several years ago her husband died and she moved to Shelbyville, Indiana. Members of her husband’s family live in the area.
3. Tammy Chandler has worked remotely for Baker for several years in Indiana.
4. Tammy Chandler works at WalMart in the area during evenings and must request time off. If she misses work, she is concerned that it may negatively affect her employment.
5. She cannot be in Houston or in the State of Texas on March 30, 2022. She will be in Shelbyville, Indiana.
6. The order issued on March 21 at docket #131 requires both Baker and Tammy Chandler to appear in person on March 30.
7. Baker requests that Tammy Chandler be allowed to participate on March 30, 2022, by video and audio for the hearing. Tammy Chandler works under the direction of Baker and any information she may have should also be known by Baker.
8. If during or after the hearing this court determines that Tammy Chandler should testify in person, then she can make arrangements to come to Houston at a later date.
9. Baker will appear in person.

WHEREFORE, PREMISES CONSIDERED, Reese Baker requests that Tammy Chandler be allowed to appear on March 30, 2022 for the show cause hearing by video and audio and not in

person and for such other and further relief as to which Reese Baker and Tammy Chandler may be entitled.

Dated: March 25, 2022

Respectfully submitted,

/s/ Reese W. Baker

Reese W. Baker

Tx Bar No. 01587700

Baker & Associates

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ATTORNEY FOR DEBTOR

CERTIFICATE OF EMERGENCY

The undersigned, Reese Baker, certifies that this request is an emergency and that the emergency consideration is necessary. I have read the above pleadings and there is a need for an emergency hearing/consideration.

/s/ Reese W. Baker

Reese W. Baker

CERTIFICATE OF SERVICE

I certify that on March 25, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Reese W. Baker

Reese W. Baker